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13 ON SIGNATURE PAGE]

14  
15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
17 OAKLAND DIVISION

18 LD, DB, BW, and CJ, on behalf of themselves  
and others similarly situated,

20 Plaintiffs,

21 v.

22 UNITED BEHAVIORAL HEALTH, a  
California Corporation, UNITED  
23 HEALTHCARE INSURANCE COMPANY, a  
Connecticut Corporation, and MULTIPLAN,  
INC., a New York Corporation,

25 Defendants.

CASE NO. 4:20-cv-02254-YGR

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE CASE  
MANAGEMENT CONFERENCE PER L.R.  
6-2**

Hon. Yvonne Gonzalez Rogers

Complaint filed: April 2, 2020

Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH and CJ, United Behavioral Health and UnitedHealth Insurance  
2 Company (“United Defendants”) and MultiPlan, Inc. (“MultiPlan”), collectively the “Parties,” to the  
3 above-entitled action jointly submit this stipulation pursuant to Civil Local Rule 6-2. In further support  
4 of this Stipulation, the Parties state as follows:

5 **WHEREAS**, on June 23, 2023, this Court issued its Scheduling and Pretrial Order setting a  
6 case management conference for Monday, October 23, 2023 at 2:00 p.m. (Dkt. 319 at 1) via Zoom  
7 webinar and ordering the parties to submit a joint case management conference statement seven days  
8 before the case management conference date (Dkt. 320 at 1);

9 **WHEREAS**, on July 27, 2023, the Court granted the Parties’ previous stipulation to continue  
10 the case management conference to October 30, 2023 and the joint case management statement  
11 deadline to October 23, 2023 (Dkt. 336 at 1);

12 **WHEREAS**, the Parties previously stipulated to extensions of deadlines for Plaintiffs’ Rebuttal  
13 Reports and the Expert Discovery Cutoff, which are proposed to be set for November 1, 2023 and  
14 November 21, 2023, respectively (Dkt. 357 at 1);

15 **WHEREAS**, the Parties believe that continuing the case management conference to a date  
16 following the Expert Discovery Cutoff will allow for a more productive case management conference  
17 and a more detailed and/or complete joint case management conference statement;

18 **WHEREAS**, the Parties have met and conferred and agreed to continue the case management  
19 conference to December 4, 2023, and continuing the deadline to submit the case management  
20 conference statement to November 27, 2023, or until such later time that is convenient for the Court;

21 **WHEREAS**, the continuance of the above deadlines will not in any way affect any of the other  
22 deadlines in the case, such as the deadlines for dispositive motions, pre-trial or trial dates;

23 **NOW, THEREFORE**, subject to the approval of the Court, and for good cause shown, the  
24 Parties hereby stipulate and agree as follows:

25 The case management conference currently scheduled for October 30, 2023 at 2:00 p.m. is  
26 continued to December 4, 2023 at 2:00 p.m. or until such later time that is convenient for the Court.  
27 The Parties’ deadline to submit their joint case management conference statement is continued to

1 November 27, 2023, or seven days in advance of the new case management conference date, whichever  
2 is later.

3

4 **IT IS SO STIPULATED.**

5 Dated: October 20, 2023

ARNALL GOLDEN GREGORY LLP

6

7 By: /s/ Thomas E. Kelly

8 Thomas E. Kelly

9 Attorneys for PLAINTIFFS

10 DATED: October 20, 2023

11 Respectfully submitted,

12 GIBSON, DUNN & CRUTCHER LLP

13 By: /s/ Lauren Blas

14 Lauren Blas

15 Attorneys for Defendants UNITED  
16 BEHAVIORAL HEALTH and UNITED  
17 HEALTHCARE INSURANCE COMPANY

18 DATED: October 20, 2023

PHELPS DUNBAR LLP

19 By: /s/ Errol J. King, Jr.

20 Errol J. King, Jr.

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## [PROPOSED] ORDER

Having considered the Parties' Joint Stipulation and [Proposed] Order, the Court HEREBY ORDERS as follows:

The case management conference currently scheduled for October 30, 2023 is continued until December 4, 2023. The Parties' deadline to submit their joint case management conference statement is continued to November 27, 2023.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated:

Hon. Yvonne Gonzalez Rogers  
UNITED STATES DISTRICT COURT JUDGE

1                   **ATTESTATION PURSUANT TO LOCAL RULE 5-1**

2                   I, Thomas E. Kelly, am the ECF user whose identification and password are being used to file  
3 this document. Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of  
4 this document has been obtained from the other signatories hereto.

5 Dated: October 20, 2023

6                   */s/ Thomas E. Kelly* \_\_\_\_\_

7                   Thomas E. Kelly